

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORACLE CORPORATION,

Plaintiff,

v.

CHARTIS SPECIALTY INSURANCE
COMPANY,

Defendant.

Civil Action No. 1:18-cv-03440-GHW

**DECLARATION OF
DEBORAH HIRSCHORN**

Deborah Hirschorn, under penalty of perjury, declares as follows:

1. I am a Complex Claims Director of AIG Property Casualty, and am authorized to submit this declaration in support of AIG Specialty Insurance Company's (f/k/a Chartis Specialty Insurance Company) ("AIGSIC") motion pursuant to Fed. R. Civ. P. 12(b)(6), to partially dismiss the Complaint, in this matter. I am fully familiar with the matters set forth herein.

2. Annexed hereto as Exhibit 1 is a true and correct copy, in redacted form, of a letter dated August 18, 2014 from Marissa Olsen of AIG Property Casualty, the claims administrator for Defendant, to Bruce Cochran of Oracle Treasury, as alleged in Paragraph 46 of the Complaint. *See* ECF Doc. No. 9.

3. Annexed hereto as Exhibit 2 is a true and correct copy of an email dated January 10, 2017 from Deborah Miller of Oracle to me, as alleged in Paragraph 57 of the Complaint.

4. Annexed hereto as Exhibit 3 is a true and correct copy of an email dated March 8, 2017 from Deborah Miller of Oracle to me, as alleged generally in Paragraph 58 of the Complaint.

5. Annexed hereto as Exhibit 4 is a true and correct copy of an email thread dated from April 10, 2017 to June 12, 2017 between Deborah Miller of Oracle and me, as alleged generally in Paragraph 58 of the Complaint.

6. Exhibits 1-4 were made or generated or received by AIG Property Casualty in the regular course of its business, and were maintained by it in the regular course of its business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 19, 2018.


Deborah Hirschorn

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